

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

CAVIUM, INC.,)
Plaintiff,) CAUSE NO. 1:17-mc-0070
vs.) Related to Case Nos. 2:16-cv-00693-RWS-
IN RE: SUBPOENA TO CROWN POINT) RSP (LEAD CASE), 2:16-cv-00692-RWS-
TRANSACTIONS LLC AND ANDREW HEIN IN) RSP, and 2:16-cv-00695-RWS-RSP
CONNECTION WITH: ALACRITECH, INC.,) Pending in: The United States District
Defendant.) Court for the Eastern District of Texas

**CAVIUM, INC.'S MOTION TO COMPEL FURTHER RESPONSES TO SUBPOENAS
TO PRODUCE DOCUMENTS TO CROWN POINT TRANSACTIONS LLC AND
ANDREW HEIN**

Plaintiff, Cavium, Inc., moves this Court to Compel Further Responses To Subpoenas To Produce Documents To Crown Point Transactions LLC and Andrew Hein.

As detailed in the Brief In Support Of The Motion and the supporting Declaration of Megan Whyman Olesek and accompanying exhibits, counsel for Cavium Ms. Olesek attempted to resolve this dispute when she met and conferred in writing and in person with counsel for Crown Point and Mr. Hein (collectively “Crown Point”) on multiple occasions concerning the relief sought in the Motion to Compel. She sent written correspondence to Crown Point and Mr. Hein’s counsel concerning the deficiencies of the responses and production by Crown Point and Mr. Hein on August 9, 14 and 22, 2017, addressed to Tina Lo and Michelle Clark of Quinn Emanuel, with a copy to the entire Quinn Emanuel case team (Crown Point’s and Mr. Hein’s counsel also are Plaintiff’s counsel in the underlying action). *See* Declaration of Megan

Whyman Olesek in Support of Motion to Compel (“Olesek Decl.”), ¶¶ 6, 7, 9; Exs. E, F, H. Michelle Clark provided a written response to the August 9 and August 14 correspondence on August 14. Olesek Decl. ¶ 8, Ex. G. She also raised the issue of the Hein and Crown Point subpoenas and whether they would be providing a further response with Iman Lordgooei, counsel for Plaintiff, Crown Point and Mr. Hein, in person during a deposition break on August 30, 2017. Olesek Decl. ¶ 10. Counsel for Crown Point and Mr. Hein, Brian Dunne, responded further in writing on August 30, 2017. Olesek Decl. ¶ 11, Ex. I. The issues in this dispute were not resolved.

In support of this Motion, Plaintiff submits its contemporaneously filed Brief In Support Of Motion to Compel Further Responses To Subpoenas To Produce Documents To Crown Point Transactions LLC and Andrew Hein.

Respectfully submitted,

s/ Robert J. Schuckit

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Counsel for Plaintiff CAVIUM, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **4th day of October, 2017**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **4th day of October, 2017**, properly addressed as follows:

Crown Point Transactions LLC c/o Andrew Hein 716 Adams Street, #H Carmel, IN 46032	Andrew Hein 933 Deer Lake Drive Carmel, IN 46032-7759
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s/ Robert J. Schuckit
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